

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
DURHAM DIVISION

In Re:

Willie Frazier Davis and Katina Parker Davis Case No. 10-81979
Chapter 13

Social Security No.: xxx-xx-9546 and xxx-xx-9676
Address: 22521 Henry Street, Laurel Hill, NC 28351-

Debtors

RESPONSE TO MOTION

The Debtors, by and through the attorney undersigned, hereby respond to the motion to disallowing the claim of Security Financial in the amount of \$2,898.43, as untimely filed by RICHARD HUTSON, and dated 8/23/11, as follows:

The Debtors do not object to the disallowance of the Security Finance Claim as unsecured. Security Finance, however, holds a lien against the Debtors' 2008 Dodge. Said lien is not supported by any value above senior lienholders and was treated completely unsecured in the Confirmation Order. Accordingly, the Debtors request that any such disallowance specifically provide that the lien against the title to the Debtors' 2008 Dodge held by Security Finance nonetheless be cancelled upon completion of the Debtors' Chapter 13 Plan.

WHEREFORE, the Debtors pray the Court deny the said motion in its entirety and grant such other relief as to the Court may seem just and proper.

Dated: September 7, 2011

LAW OFFICES OF JOHN T. ORCUTT, P.C.

/s John T. Orcutt

John T. Orcutt
6616-203 Six Forks Road
Raleigh, NC 27615
(919) 847-9750

CERTIFICATE OF SERVICE

I, Charlene Ennemoser, of the Law Offices of John T. Orcutt, P.C., certify under penalty of perjury that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; that on September 7, 2011, I served copies of the foregoing Response to Motion, by regular U.S. mail, upon the following parties (names and addresses):

Willie Frazier Davis and Katina Parker Davis
22521 Henry Street
Laurel Hill, NC 28351-

Richard M. Hutson, II
Chapter 13 Trustee
P.O. Box 613
Durham, N.C. 27702-3613

/sCharlene Ennemoser
Charlene Ennemoser